

THE MARKS LAW FIRM, P.C.

March 11, 2016

Via: ECF

District Judge Gregory H. Woods
Southern District of New York
United States Courthouse
500 Pearl St.
New York NY 10007-1312
WoodsNYSDChambers@nysd.uscourts.gov

RE: Doncouse v. Ray And Frank Liquor Store Inc., A Domestic Business Corporation, And Clinton Associates
Docket: 1:16-cv-00280 (GHW)

Honorable Gregory H. Woods,

The undersigned counsel represents Plaintiff, Graciela B. Doncouse, in the above referenced matter. At this time, there is an Initial Pretrial Conference scheduled for Monday March 14, 2016 at 4:00pm. We respectfully request an adjournment of this scheduled hearing. At this time, we are currently awaiting the Defendants to answer and or respond to the complaint. Our office has also mailed out Your Honors recent March 9, 2016 Order to the Defendants.

Our office has been attempting to contact Defendants to confirm if they will appear or not in this action. Plaintiff has served Defendants, via secretary of state, on February 3, 2016, and the answer or response was due by February 26, 2016. We believe that with some more time, we can speak to the Defendants directly and hopefully they will appear on the case. If not, then Plaintiff will be left with no alternative but to move for a default (which we hope will not be the case).

Therefore, we respectfully request an adjournment of the March 14, 2016 hearing for 30 days to April 14, 2105 or soon thereafter, providing time for Plaintiff to continue to reach out to Defendants or otherwise move for default. This is the first request for an adjournment.

We thank you for your time and consideration on this matter.

Respectfully Submitted,

The Marks Law Firm, P.C.

BY:



Bradly G. Marks